

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

TAQUAY DEZJUAN OSBORNE

Case: 2:21-mj-30091

Assigned To : Unassigned

Assign. Date : 2/24/2021

SEALED MATTER (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 22, 2018 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in Possession of a Firearm

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 24, 2021

City and state: Detroit, MI

Jennifer Kapushinski
Complainant's signature

Jennifer Kapushinski, Task Force Officer, FBI
Printed name and title

GP

Judge's signature

Hon. Curtis Ivy, Jr., United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jennifer Kapushinski, having been duly sworn, state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigations assigned to the Violent Gang Task Force (VGTF) and have been since October of 2018. I have been employed as a police officer for the city of Detroit since November of 2014. I have experience and knowledge regarding the east side of Detroit from the time I spent as a patrol officer within the fifth precinct, where I spent equal time assisting the ninth precinct during patrol. I was assigned to the Detroit Police Gang Intelligence Unit in approximately March of 2016, where I assisted in gang-related investigations. I began working with the FBI Violent Gang Task Force in approximately October of 2018, where I continued assisting with gang-related investigations. I have been involved in numerous investigations regarding non-fatal and fatal shootings with a gang nexus as well as additional gang-related investigations.

2. This affidavit is being submitted in support of a criminal complaint alleging that TAQUAY DEZJUAN OSBORNE has violated 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging OSBORNE with the above listed violation, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts

that I believe are necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge as well as information provided to me by other law enforcement agents and witnesses.

4. On August 22, 2018 at approximately 2:10 p.m., uniformed Detroit police officers with the Gang Intelligence Unit were traveling westbound on Moross Road approaching Kelly Road on the east side of Detroit, Michigan when they observed a black male wearing a black shirt and black jeans, later identified as TAQUAY OSBORNE, standing in the parking lot of 18505 Kelly Road. As officers drove their scout car into the parking lot of the location, OSBORNE had his back towards the officers, and officers observed a large bulge in OSBORNE's waistband on the right side of his body that extended his shirt outward. As officers approached, OSBORNE clutched his right side where the bulge was and began to flee from officers on foot. Officers pursued OSBORNE and observed a black handgun fall from OSBORNE's waistband onto the grass median as he ran across Kelly Road. OSBORNE was apprehended in the rear of a vacant building at 16115 E. Seven Mile Road. Officers returned to where they observed the handgun fall and recovered a black 40 caliber Glock model 23 with the serial number VMT354 with a laser on the front. OSBORNE did not have a concealed pistol license and was arrested for Carrying a Concealed Weapon - Person.

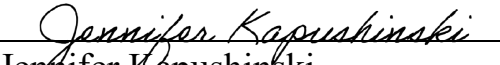
5. OSBORNE has been previously convicted of felonies, that is, crimes punishable by a term of imprisonment of more than one year. Specifically, in 2017, he was convicted of Retail Fraud - First Degree, in the Third Judicial Circuit Court, Wayne County, Michigan, in case number 17-000164-01. Also in 2017, OSBORNE was convicted of Property - Receiving and Concealing - Motor Vehicle, in the Sixteenth Circuit Court, Macomb County, Michigan, in case number 20122118.

6. Additionally, on May 22, 2017, OSBORNE plead guilty to Retail Fraud – First Degree, in the Sixth Judicial Circuit Court, Oakland County, Michigan, in Case Number 17-262769. That same day, in connection with his guilty plea, OSBORNE signed a form indicating he knew that the maximum penalty for the offense to which he plead guilty is five years’ imprisonment. On July 10, 2017, the court sentenced OSBORNE to two years of probation.

7. On January 14, 2021, I contacted Alcohol Tobacco and Firearms Special Agent Michael Jacobs, an Interstate Nexus Special Agent, and advised him of the seizure of the black 40 caliber Glock model 23 firearm. Special Agent Jacobs was provided with a verbal description of the Glock model 23 firearm. Special Agent Jacobs, based on his training and experience, advised me that the firearm meets the federal definition of a firearm and was manufactured outside the state of Michigan, and therefore, had traveled and affected interstate commerce.

8. Based on the facts set above, I believe that probable cause exists to believe TAQUAY DEZJUAN OSBORNE knowingly possessed a firearm, having been previously convicted of a crime punishable by more than one year of imprisonment, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,


Jennifer Kapushinski
Task Force Officer,
Federal Bureau of Investigations

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable Curtis Ivy, Jr.
United States Magistrate Judge

Date: February 24, 2021